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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

ELIZABETH REDDY,

Plaintiff.

v.

LIFE INSURANCE COMPANY OF NORTH AMERICA,

Defendant.

Case No. 3:18-cv-2211-YY

PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE MOTION FOR PREJUDGMENT INTEREST AND SUPPORTING AFFIDAVITS UNDER SEAL

Expedited Review Respectfully Requested

CERTIFICATION PER L.R. 7.1

The undersigned counsel for Plaintiff certifies that she has conferred with Defendant's counsel regarding this Motion and has been advised Defendant does not oppose it.

MOTION

Pursuant to Fed. R. Civ. P. 5.2(d) and LR 5-2(d), Plaintiff hereby moves for an Order for

MOTION FOR LEAVE TO FILE PLAINTIFF'S MOTION FOR PREJUDGMENT INTEREST AND SUPPORTING AFFIDAVITS UNDER SEAL - Page 1 of 2 Megan E. Glor, Attorneys at Law 707 NE Knott Street, Suite 101 Portland, OR 97212 503-223-7400 leave to file under seal Plaintiff's Motion For Prejudgment Interest and supporting Affidavits, insofar as they reveal the contents of documents containing confidential and proprietary information that are subject to a protective order.

CONCLUSION

WHEREFORE, Plaintiff respectfully asks this Court enter an Order requiring that the foregoing pleadings be filed under seal.

DATED: January 2, 2020.

Respectively Submitted,

s/ Megan E. GlorMegan E. Glor, OSB No. 930178Attorney for Plaintiff